

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROBERTO ALMODOVAR,)	
)	
Plaintiff,)	Case No. 18 CV 02341
)	
v.)	Honorable Joan B. Gottschall
)	Magistrate Judge M. David Weisman
REYNALDO GUEVARA, et al.)	
)	
Defendants.)	

WILLIAM NEGRON)	
)	
Plaintiff,)	Case No. 18 CV 02701
)	
v.)	Honorable Joan B. Gottschall
)	Magistrate Judge M. David Weisman
REYNALDO GUEVARA, et al.)	
)	
Defendants.)	

PLAINTIFF NEGRON’S UNOPPOSED MOTION FOR EXTENSION OF TIME

Plaintiff William Negron, through his counsel, Loevy & Loevy, respectfully moves for an extension of time to file his response in opposition to Defendants’ motions for summary judgment. In support of his motion, Plaintiff state as follows:

1. Defendant Olzweski filed his motion for summary judgment on December 21, 2022 (Dkt. 193).
2. Plaintiff’s response deadline is February 3, 2023 (Dkt. 196).
3. Counsel with primary responsibility for Plaintiff Negron’s response has been faced with a number of time-sensitive deadlines including a summary judgment response

deadline of January 24, 2023, in *Pursley v. City of Rockford*, No. 3:18-cv-50040 (N.D. Ill.); close of discovery on January 31, 2023 in *Hunter v. Wexford, et al.*, No. 3:21-CV-00271 (S.D. Ill.); most of fact discovery closing in *Savory v. Cannon, et. al.*, No. 17-CV-00204 (N.D. Ill.) on February 6, 2023; and a hearing before the Illinois Parole Board in the *People v. Kibayasi*, Cook County No. 09-CR-17820-01, on January 12, 2023. Until last Thursday, counsel was also preparing for a two-day sentencing hearing in Jackson County, Illinois in the case of *People v Neal*, No. 1996 CF 409 that was set to go forward on February 2 and 3, 2023, but was just unexpectedly continued.

4. Plaintiff Negron requires the extension in order to have sufficient time to respond adequately to Defendant Olszewski's motion and ensure that the Court is fully apprised of all the relevant facts and legal arguments that support Plaintiff's claims.

5. Plaintiff Negron does not seek this request lightly or for purposes of interposing undue delay in either case.

6. Counsel for Defendant Olszewski and Plaintiff Almodovar do not oppose this motion.

7. For the foregoing reasons, Plaintiff Negron requests a fifteen-day extension for both himself and Plaintiff Almodovar (so that they can coordinate their responses as necessary and appropriate) to Friday, February 17, 2023.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests an order extending the deadline for Plaintiff to file his response to Defendants' motions for summary judgment to February 17, 2023.

Respectfully Submitted,

/s/ Lindsay Hagy
One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

I, Lindsay Hagy, an attorney, hereby certify that on January 30, 2023, I filed the foregoing motion using the Court's CM/ECF system, which effectuated service on all counsel of record.

/s/ Lindsay Hagy
One of Plaintiff's Attorneys